IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

UNITED STATES OF AMERICA

v. CRIMINAL NO.: 3:23-cr-00123-CWR-ASH

JUSTIN BRYCE BROWN

DEFENDANT

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW Justin Bryce Brown, Defendant herein, by and through undersigned counsel, and files this his Unopposed Motion for Continuance of the trial date and all accompanying deadlines, and in support thereof would show unto the Court the following:

- 1. That this case is currently set for trial on July 1, 2024.
- 2. The Defendant was indicted on December 13, 2023, and thereafter appeared for initial appearance and arraignment on April 25, 2024.
- 3. Counsel for the Defendant has obtained discovery, but additional time is needed to review this discovery, to conduct an independent investigation and to fully prepare for the trial of this case.
- 4. That counsel for the Defendant has conferred with the attorney for the government and there is no objection to the relief requested by this motion on the part of the government.
- 5. That the Defendant expressly waives his right to a speedy trial herein, and counsel submits that by granting this motion, the ends of justice are served in that the right of the Defendant to a fair trial outweighs the public's right to a speedy trial.
- 6. That based on the foregoing, counsel moves this Court to continue the trial of this case and all accompanying deadlines to a date certain which is sufficiently advanced to allow the parties time to prepare for and try this case.

WHEREFORE, PREMISES CONSIDERED, counsel for the Defendant, Justin Bryce Brown, respectfully moves this Honorable Court to enter an order continuing the trial date and all accompanying deadlines to the next available court term.

Respectfully submitted, this the 14th day of May, 2024.

/s/ Joe M. Hollomon

JOE M. HOLLOMON (MSB #2551) ATTORNEY FOR AND ON BEHALF OF JUSTIN BRYCE BROWN

OF COUNSEL:

JOE M. HOLLOMON & ASSOCIATES, P.A. 107 North State Street (39201) Post Office Box 22683 Jackson, Mississippi 39225-2683

Tel: (601) 353-1300 Fax: (601) 353-1308

Email: jhollomon@outlook.com joehollomonlaw@yahoo.com

CERTIFICATE OF SERVICE

I, Joe M. Hollomon, attorney for the Defendant, do hereby certify that I have this date electronically filed the foregoing *Unopposed Motion for Continuance* with the Clerk of the Court using the Electronic Case Filing (ECF) system, which sent notification of such filing to all counsel of record.

This, the 14th day of May, 2024.

/s/ Joe M. Hollomon

JOE M. HOLLOMON